

**UNITED STATES DISTRICT COURT  
DISTRICT OF ARIZONA**

**IN RE BARD IVC FILTERS PRODUCT  
LIABILITY LITIGATION**

Civil Action No. 2:15-MD-02641-PHX-DGC  
MDL No. 2641

This Document Relates to:  
Susan Dunn,  
2:18-cv-02875-DGC

**STIPULATION OF DISMISSAL WITH PREJUDICE**

COME NOW, Plaintiff, Susan Dunn, and Defendants C.R. Bard, Inc. and Bard Peripheral Vascular, Inc. ("Defendants"), file this Stipulation of Dismissal with Prejudice, and in support thereof, respectfully show the Court as follows:

Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), Plaintiff and Defendants hereby stipulate to the dismissal of the above-captioned case with prejudice to the re-filing of same. Plaintiffs and Defendants further stipulate that they are to bear their own costs.

WHEREFORE, PREMISES CONSIDERED, Plaintiffs and Defendants hereby respectfully request that the Court dismiss the cases listed on Exhibit A in their entirety with prejudice to the re-filing of same and order that these parties are to bear their own costs.

Respectfully Submitted,

/s/ Basil E. Adham

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 13<sup>th</sup> day of May, 2021, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which automatically sends an electronic notification to all counsel of record and other CM/ECF participants.

/s/ Basil E. Adham  
Basil E. Adham